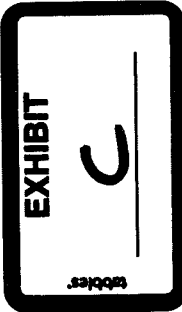


DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
07/01/14	CM	Review of discovery requests/responses	1.3	\$150.00	\$195.00
07/11/14	CM	Draft third-party request for production of documents (cell phone communication records between manager and employee on personal phone) and downloaded N.D. Georgia subpoena form	2.6	\$150.00	\$390.00
07/11/14	CM	Draft third-party request for production of documents (cell phone communication records between manager and employee on personal phone) and downloaded N.D. Georgia subpoena form	2.6	\$150.00	\$390.00
08/07/14	CM	Drafted memo discussing requirements to extend statute of limitations to 3 years via willfulness and ability of employer to assert good faith and avoid liquidated damages	2.8	\$150.00	\$420.00
08/08/14	CM	Drafted additional portion of memo assessing whether relation back doctrine can be used for opt-in plaintiffs to change tolling date (1.0)	1.0	\$150.00	\$150.00
10/02/15	CM	Correspondence with JB; Initial research into Youth Villages entity status	0.7	\$225.00	\$157.50
10/07/15	CM	Research into Tennessee nonprofit status and corporate history in GA & NY	1.2	\$225.00	\$270.00
12/09/15	CM	Analysis of cases in district courts re: summary judgment and FLSA preemption of state law contract claims (2.3)	2.3	\$225.00	\$517.50
TOTAL HOURS/AMOUNT			14.5		\$2,490.00
09/01/13	DRK	Meeting with potential clients; discussion of future actions, discovery needed, key witnesses and documents, and future actions	4.5	\$400.00	\$1,800.00
09/15/13	DRK	Review of JB research and meeting with JB re outlining complaint	1.3	\$400.00	\$520.00
09/25/13	DRK	Edit of first draft of complaint and return to JB with comments (1.0)	1.0	\$400.00	\$400.00
02/18/14	DRK	DRK edit of motion for conditional certification (2.3); preparation of new declaration needed for same (2.0); o/c with JB re same (.5)	4.8	\$400.00	\$1,920.00
03/03/14	DRK	Conference with JB re status, future actions, strategic planning	0.5	\$400.00	\$200.00
04/19/14	DRK	Meeting with Jamie Stephenson re deposition preparation, future actions	3.0	\$400.00	\$1,200.00
04/23/14	DRK	Taking of W. Booze deposition, and brief discussions with Jim Mulroy re status, future actions	3.8	\$400.00	\$1,520.00
11/20/14	DRK	Call with Jim Mulroy re status, future actions; email to JB re same	0.5	\$400.00	\$200.00



DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/01/14	DRK	Multiple emails to/from o/c re status, future actions; call from clients re status, answering their questions	1.0	\$400.00	\$400.00
12/02/14	DRK	Meeting with JB	0.3	\$400.00	\$120.00
01/12/15	DRK	Travel to Douglasville, meeting with multiple clients re preparation for deposition; review of key documents and payroll items with clients; defending of depositions	9.1	\$400.00	\$3,640.00
01/12/15	DRK	travel to Douglasville, meeting with multiple clients re preparation for deposition; review of key documents and payroll items with clients; defending of depositions	9.1	\$400.00	\$3,640.00
01/13/15	DRK	Meeting with clients re defending depositions	0.8	\$400.00	\$320.00
01/13/15	DRK	meeting with clients re defending depositions (.8); o/c with JB re same (.3); participation in deposition (6.6)	7.7	\$400.00	\$3,080.00
01/15/15	DRK	Meeting with clients/witnesses in Douglasville	3.8	\$400.00	\$1,520.00
01/15/15	DRK	Review of Rule 11 notice and research re same and lengthy preparation of draft response (3.5)	3.5	\$400.00	\$1,400.00
01/20/15	DRK	call with Matthew Thompson and discussion of expert report issues (1.1)	1.1	\$400.00	\$440.00
01/20/15	DRK	call with Matthew Thompson and discussion of expert report issues (1.1)	1.1	\$400.00	\$440.00
01/22/15	DRK	Preparation of discovery dispute synopsis for Court; calls from clients re status, future actions	2.4	\$400.00	\$960.00
01/27/15	DRK	Engaging in discovery call with Judge Jones re status, future actions (.4)	0.4	\$400.00	\$160.00
02/24/15	DRK	Call from clients re 1.50 600.00 status, futue actions (1.1)	1.1	\$400.00	\$440.00
02/25/15	DRK	Long calls from clients re future actions, status (1.4)	1.4	\$400.00	\$560.00
03/14/15	DRK	Work on draft motion for summary judgement	8.4	\$400.00	\$3,360.00
03/25/15	DRK	meeting with JB re review and edit of discovery responses	0.3	\$400.00	\$120.00
04/07/15	DRK	Work on draft response for motion for s.j., SMF response	8.2	\$400.00	\$3,280.00
07/25/15	DRK	Review of YV Motion to dismiss on Joinder grounds; research re response, other rulings by Judge; email to Telephone call and JB outlining draft response, sending research for same	6.7	\$400.00	\$2,680.00
07/25/15	DRK	review of YV Motion to dismiss on Joinder grounds; research re response, other rulings by Judge; email to Telephone call and JB outlining draft response, sending research for same	6.7	\$400.00	\$2,680.00
12/07/15	DRK	continued work on responses to motions to dismiss, motion for summary judgment in Caudle	7.0	\$400.00	\$2,800.00
02/02/16	DRK	Meeting with clients and JB in prep for mediation	1.0	\$400.00	\$400.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
03/28/16	DRK	Receipt and review of joint motion for approval and draft order re same; (.8)	0.8	\$400.00	\$320.00
03/29/16	DRK	Short email to Jim M. re status	0.2	\$400.00	\$80.00
04/14/16	DRK	Meeting with various clients re check distribution, discussion with Mr. Artamus re his confusion about settlement amounts and future actions.	0.8	\$400.00	\$320.00
TOTAL HOURS/AMOUNT			102.3		\$40,920.00
01/06/15	DS	Researched and reserved hotel and meeting rooms in Douglasville, GA for depositions	0.8	\$85.00	\$68.00
01/09/15	DS	Prepare and print and copy documents for upcoming depositions (1.5)	1.5	\$85.00	\$127.50
01/13/15	DS	Drafted and finalized letter to J. Mulroy	0.2	\$85.00	\$17.00
01/14/15	DS	Download, saved and printed Defendants document production (.3)	0.3	\$85.00	\$25.50
01/15/15	DS	Scanned and saved discovery responses	0.3	\$85.00	\$25.50
01/20/15	DS	Draft, finalize and email 30(b)(6) of Latonya Pendelton to opposing counsel	0.4	\$85.00	\$34.00
01/20/15	DS	Burn discovery production to disc for overnight delivery to M. Thompson (.5)	0.5	\$85.00	\$42.50
01/21/15	DS	Forward discovery produced by Youth Villages to M. Thompson via CRA secure file system	1.5	\$85.00	\$127.50
01/23/15	DS	Forward all discovery received from Youth Villages to M. Thompson at CRA	1.0	\$85.00	\$85.00
01/27/15	DS	Save Travis Floyd deposition transcript and exhibits	0.3	\$85.00	\$25.50
01/27/15	DS	Save discovery documents received from Youth Villages	0.3	\$85.00	\$25.50
01/28/15	DS	Create shell of consolidated Request for production of documents and ROG responses	2.3	\$85.00	\$195.50
02/04/15	DS	Per JB's request I drafted and mailed letters to the 27 plaintiffs that we did not receive signed verifications from	2.5	\$85.00	\$212.50
04/16/15	DS	Finalize and file Motion for Summary Judgment with exhibits	2.3	\$85.00	\$195.50
04/30/15	DS	Recreate Exhibit 24 of Motion for Summary Judgment	1.0	\$85.00	\$85.00
TOTAL HOURS/AMOUNT			15.2		\$1,292.00
09/05/13	JB	Legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	3.0	\$250.00	\$750.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
09/06/13	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	4.0	\$250.00	\$1,000.00
09/09/13	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	2.0	\$250.00	\$500.00
09/11/13	JB	Finalize legal research on FWW and prepare a memo summarizing the same	1.0	\$250.00	\$250.00
09/16/13	JB	Begin drafting complaint	0.5	\$250.00	\$125.00
09/23/13	JB	Review and analyze recent Northern District of Illinois opinion relating to fww and draft a summary of the same	0.8	\$250.00	\$200.00
09/27/13	JB	Draft follow-up correspondence to clients regarding completion of questionnaire	0.1	\$250.00	\$25.00
09/30/13	JB	Continue to draft complaint (0.5)	0.5	\$250.00	\$125.00
10/22/13	JB	Continue to prepare complaint	1.5	\$250.00	\$375.00
10/23/13	JB	Review and analyze Lamonica v. Safe Hurricane Shutters, Inc. a 2013 11th Circuit opinion to determine whether it affects our case and draft a summary of the same	0.5	\$250.00	\$125.00
10/23/13	JB	Continue to prepare complaint (2.0)	2.0	\$250.00	\$500.00
11/20/13	JB	Revise and edit complaint and prepare the same for filing	1.0	\$250.00	\$250.00
01/17/14	JB	Draft correspondence to opposing counsel regarding scheduling Rule 26(f) conference (.4)	0.4	\$250.00	\$100.00
01/24/14	JB	Begin drafting Plaintiffs first requests for production of documents	0.5	\$250.00	\$125.00
01/24/14	JB	Begin to prepare Plaintiffs motion for conditional certification	0.5	\$250.00	\$125.00
01/24/14	JB	Begin drafting Plaintiffs first requests for production of documents	0.5	\$250.00	\$125.00
01/28/14	JB	Draft and respond to multiple correspondence to opposing counsel regarding 26(f) conference and JPR (.2)	0.2	\$250.00	\$50.00
01/30/14	JB	Continue preparing Plaintiffs first discovery requests	2.0	\$250.00	\$500.00
02/03/14	JB	Confer with DRK on the status of the case and prepare correspondence to opposing counsel regarding joint preliminary planning report	0.3	\$250.00	\$75.00
02/04/14	JB	Review and analyze Defendants revisions to the JPR, confer with DRK regarding the same, and begin to prepare a revised draft of the JPR	1.0	\$250.00	\$250.00
02/04/14	JB	Continue drafting Plaintiffs first requests for production of documents	1.0	\$250.00	\$250.00
02/04/14	JB	Legal research on the legal standard for a motion for certification of a collective action and begin drafting the same	2.0	\$250.00	\$500.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
02/04/14	JB	Legal research on previous FLSA cases in from of Judge Steve Jones and any review any related opinions and briefs related to a motion for certification of a collective action	3.0	\$250.00	\$750.00
02/04/14	JB	Legal research on the legal standard for a motion for certification of a collective action and begin drafting the same	2.0	\$250.00	\$500.00
02/04/14	JB	Continue drafting Plaintiffs first requests for production of documents	1.0	\$250.00	\$250.00
02/06/14	JB	Continue to prepare motion for conditional certification	2.6	\$250.00	\$650.00
02/06/14	JB	Continue to revise Plaintiffs first requests for production of documents	0.7	\$250.00	\$175.00
02/07/14	JB	Continue to prepare motion for conditional certification including preparing affidavits for each client and preparing proposing notice of action and consent	3.5	\$250.00	\$875.00
02/10/14	JB	Continue to draft and revise 30(b)(6) deposition topics	0.5	\$250.00	\$125.00
02/10/14	JB	Continue to draft and revise first requests for production of documents	0.3	\$250.00	\$75.00
02/10/14	JB	Prepare Plaintiffs first interrogatories to Defendant	1.0	\$250.00	\$250.00
02/10/14	JB	Revise and edit motion for conditional certification	1.0	\$250.00	\$250.00
02/10/14	JB	Continue to draft and revise first requests for production of documents	0.3	\$250.00	\$75.00
02/11/14	JB	Draft correspondence to opposing counsel regarding scheduling depositions (.1); draft correspondence to DRK regarding finalizing initial disclosures and strategy for depositions (.1); draft correspondence to Mr. Davis regarding receipt of declaration (.2)	0.4	\$250.00	\$100.00
02/11/14	JB	Draft correspondence to opposing counsel regarding scheduling depositions (.1); draft correspondence to DRK regarding finalizing initial disclosures and strategy for depositions (.1)	0.2	\$250.00	\$50.00
02/13/14	JB	Draft correspondence to opposing counsel regarding deposition scheduling (.5)	0.5	\$250.00	\$125.00
02/13/14	JB	phone call with Phillip Davis regarding declaration in support of motion for conditional certification (.3)	0.3	\$250.00	\$75.00
02/14/14	JB	Revise and edit motion for conditional certification	3.0	\$250.00	\$750.00
02/17/14	JB	Continue to revise and edit motion for conditional certification (.3)	0.3	\$250.00	\$75.00
02/18/14	JB	Prepare for David Thompson interview; phone call with Jamie Stephenson; confer with DRK regarding motion for conditional certification	0.7	\$250.00	\$175.00
02/24/14	JB	Review and analyze defendants discovery requests, create a chart regarding the same to organize plaintiffs responses (1.0)	1.0	\$250.00	\$250.00
02/24/14	JB	Prepare correspondence to clients regarding discovery and status of the litigation	0.3	\$250.00	\$75.00
02/24/14	JB	Revise and finalize motion for conditional certification	1.3	\$250.00	\$325.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
03/14/14	JB	Begin drafting reply brief in support of motion for conditional certification (2.5)	2.5	\$250.00	\$625.00
03/14/14	JB	Continue to prepare responses and objections to defendants discovery interrogatories, requests for production of documents and request for admission to three plaintiffs	3.5	\$250.00	\$875.00
03/14/14	JB	Review and analyze Defendants response in opposition to Plaintiffs motion for conditional certification and read the legal opinions cited in the same (1.0); begin drafting reply brief in support of motion for conditional certification (2.5)	3.5	\$250.00	\$875.00
03/14/14	JB	Continue to prepare responses and objections to defendants discovery interrogatories, requests for production of documents and request for admission to three plaintiffs	3.5	\$250.00	\$875.00
03/18/14	JB	Meeting with Paul Willoughby regarding responses to discovery requests	1.5	\$250.00	\$375.00
03/18/14	JB	Meeting with Paul Willoughby regarding responses to discovery requests (1.5);	1.5	\$250.00	\$375.00
03/18/14	JB	phone call with Crystal Foster-Gadsden regarding responses to discovery requests (0.5)	0.5	\$250.00	\$125.00
03/18/14	JB	Continue to prepare reply brief in support of motion for conditional certification (2); prepare declaration of Paul Willoughby in support of motion for conditional certification (0.3)	2.3	\$250.00	\$575.00
03/21/14	JB	Continue to prepare reply in support of motion for conditional certification	2.0	\$250.00	\$500.00
03/22/14	JB	Continue to prepare reply in support of motion for conditional certification	1.5	\$250.00	\$375.00
03/24/14	JB	Continue to draft and revise reply in support of motion for conditional certification	2.3	\$250.00	\$575.00
03/24/14	JB	Continue to draft and revise reply in support of motion for conditional certification	2.3	\$250.00	\$575.00
03/25/14	JB	Meeting with Phillip Davis regarding discovery responses	0.7	\$250.00	\$175.00
03/25/14	JB	Meeting with Paul Willoughby regarding discovery responses	1.5	\$250.00	\$375.00
03/25/14	JB	Continue to prepare responses and objections to defendants discovery requests; confer with DRK regarding discovery responses and reply brief	0.8	\$250.00	\$200.00
03/25/14	JB	Continue to revise and edit reply in support of motion for conditional certification	0.5	\$250.00	\$125.00
03/26/14	JB	Confer with DRK regarding status of the litigation; phone call to Jamie Stephenson regarding the same	0.3	\$250.00	\$75.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
03/27/14	JB	Revise and edit reply in support of motion for conditional certification; phone call with Jamie Stephenson regarding status of the litigation	1.0	\$250.00	\$250.00
03/27/14	JB	Revise and edit reply in support of motion for conditional certification; phone call with Jamie Stephenson regarding status of the litigation	1.0	\$250.00	\$250.00
04/08/14	JB	Review and analyze Defendants responses to plaintiffs interrogatories and requests for production of documents and prepare charts summarizing the same	2.0	\$250.00	\$500.00
04/08/14	JB	Review and analyze Defendants responses to plaintiffs interrogatories and requests for production of documents and prepare charts summarizing the same	2.0	\$250.00	\$500.00
04/09/14	JB	Meeting with Cyrstal Foster-Gadsden re consent to withdraw documents	0.2	\$250.00	\$50.00
04/09/14	JB	Phone call to clients to schedule deposition prep meetings	0.2	\$250.00	\$50.00
04/09/14	JB	Legal research on fluctuating workweek prerequisites in order to prepare for depositions	3.7	\$250.00	\$925.00
04/09/14	JB	Prepare for depositions of defendants	1.0	\$250.00	\$250.00
04/09/14	JB	Legal research on fluctuating workweek prerequisites in order to prepare for depositions	3.7	\$250.00	\$925.00
04/15/14	JB	Continue to review defendants document production and prepare for depositions	2.7	\$250.00	\$675.00
04/16/14	JB	Continue to review Defendants document production to prepare for depositions and prepare discovery deficiency letter	4.0	\$250.00	\$1,000.00
04/17/14	JB	Continue to prepare to for client deposition prep meeting; continue to prepare outline for depositions of Youth Villages employees	3.0	\$250.00	\$750.00
04/18/14	JB	Meeting with Phillip Davis regarding deposition	1.5	\$250.00	\$375.00
04/18/14	JB	Meeting with Jamie Stephenson regarding deposition of current Youth Villages employees	1.5	\$250.00	\$375.00
04/18/14	JB	Meeting with Phillip Davis regarding deposition (1.5); meeting with Jamie Stephenson regarding deposition of current Youth Villages employees (1.5); continue to prepare and revise outline of depositions of Youth Villages employees (1);	4.0	\$250.00	\$1,000.00
04/21/14	JB	Prepare for meeting with Paul Willoughby regarding deposition preparation	0.1	\$250.00	\$25.00
04/21/14	JB	Meeting with Paul Willoughby to prepare for clients deposition	2.1	\$250.00	\$525.00
04/21/14	JB	Review and respond to multiple correspondence with opposing counsel regarding status of depositions, employees and managers and requirement for subpoena	0.4	\$250.00	\$100.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
04/21/14	JB	Review and respond to multiple correspondence with opposing counsel regarding status of depositions, employees and managers and requirement for subpoena	0.4	\$250.00	\$100.00
04/22/14	JB	Prepare for depositions of Mr. Booze and Mr. Graham	2.5	\$250.00	\$625.00
04/24/14	JB	Prepare for and defend deposition of Paul Willoughby	5.3	\$250.00	\$1,325.00
04/24/14	JB	Prepare for and take deposition of David Thompson	2.0	\$250.00	\$500.00
04/24/14	JB	Prepare summary of today's depositions	0.2	\$250.00	\$50.00
04/24/14	JB	JB Phone call with Mr. Stephenson regarding depositions 0.20 50.00	0.2	\$250.00	\$50.00
04/30/14	JB	revise Plaintiffs second requests for production of documents (.8)	0.8	\$250.00	\$200.00
05/20/14	JB	Meeting with ZK regarding case and to discuss creating a chart of the FWW violations and damages estimations	1.0	\$250.00	\$250.00
05/20/14	JB	Prepare for prospective client meetings	0.8	\$250.00	\$200.00
05/21/14	JB	Meeting with J. Simms regarding consent to join the lawsuit; phone calls to various prospective plaintiffs; review and analyze defendants settlement offer correspondence	1.8	\$250.00	\$450.00
05/21/14	JB	Meeting with Amber Davis regarding joining the lawsuit	0.2	\$250.00	\$50.00
05/21/14	JB	Meeting with Fannie Cham regarding joining the lawsuit	0.2	\$250.00	\$50.00
05/21/14	JB	Prepare for prospective client meeting with Markus Brown; meeting with Markus Brown	0.5	\$250.00	\$125.00
05/23/14	JB	Prepare supplement in support of motion for conditional certification by reviewing relevant deposition transcriptions, drafting said motion and gathering exhibits	4.3	\$250.00	\$1,075.00
05/23/14	JB	Prepare supplement in support of motion for conditional certification by reviewing relevant deposition transcriptions, drafting said motion and gathering exhibits	4.3	\$250.00	\$1,075.00
05/28/14	JB	Phone call with Phillip Davis regarding meeting	0.1	\$250.00	\$25.00
05/30/14	JB	Prepare for meeting with Phillip Davis (0.5); meeting with Phillip Davis to discuss settlement offer (0.4)	0.9	\$250.00	\$225.00
06/11/14	JB	Prepare follow-up correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs first request for production of documents	1.5	\$250.00	\$375.00
06/11/14	JB	Prepare correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs second request for production of documents	0.7	\$250.00	\$175.00
06/22/14	JB	review and analyze Defendants motion for partial summary judgment and exhibits and prepare a summary of the same to DRK (0.6)	0.6	\$250.00	\$150.00
06/30/14	JB	Continue to draft reply in support of motion for leave to file supplemental briefing in support of motion for conditional certification	2.6	\$250.00	\$650.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
06/30/14	JB	Continue to draft reply in support of motion for leave to file supplemental briefing in support of motion for conditional certification	2.6	\$250.00	\$650.00
06/30/14	JB	Begin to prepare Rule 56(d) motion regarding the need for additional time before responding to a motion for summary judgment	2.4	\$250.00	\$600.00
07/01/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d)	0.8	\$250.00	\$200.00
07/01/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d)	0.8	\$250.00	\$200.00
07/02/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d) and attorney declaration in support	2.8	\$250.00	\$700.00
07/02/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d) and attorney declaration in support	2.8	\$250.00	\$700.00
07/07/14	JB	Revise response to defendants motion for summary judgment pursuant to Rule 56(d); prepare supporting declaration of Julie Burke; prepare response for filing	3.3	\$250.00	\$825.00
07/08/14	JB	Phone calls to Phillip Davis and Byron Graham regarding status of the litigation	0.5	\$250.00	\$125.00
07/17/14	JB	Prepare litigation status update correspondence to J. Stephenson	0.1	\$250.00	\$25.00
08/18/14	JB	Phone call with S. Brinkley regarding litigation status	0.1	\$250.00	\$25.00
08/19/14	JB	Phone calls with S. Brinkley and F. Cham regarding litigation status	0.1	\$250.00	\$25.00
10/03/14	JB	Review and analyze order on motion for conditional certification (.3)	0.3	\$250.00	\$75.00
10/06/14	JB	Review Courts summary Judgment Order	0.1	\$250.00	\$25.00
10/07/14	JB	Research recent Judge Story opinion on fluctuating workweek damages (.5); legal research on recent decisions nationally relating to fluctuating workweek (.5); review Judge Jones docket for FWW cases (.2)	1.2	\$250.00	\$300.00
10/15/14	JB	Finalize discovery deficiency letter to opposing counsel and prepare second interrogatories (0.3)	0.3	\$250.00	\$75.00
10/20/14	JB	Conduct office meeting regarding conditional certification process	1.0	\$250.00	\$250.00
12/01/14	JB	Multiple communications regarding mediation status (.2)	0.2	\$250.00	\$50.00
12/01/14	JB	Phone calls with opt-ins regarding scheduling depositions (.5);	0.5	\$250.00	\$125.00
12/02/14	JB	Confer with DRK regarding mediation status and strategy (.3)	0.3	\$250.00	\$75.00
12/02/14	JB	Schedule opt-in depositions (.2);	0.2	\$250.00	\$50.00
12/04/14	JB	Prepare to defend depositions of opt-ins by reviewing Defendants prior depositions of party plaintiffs, preparing outline of likely questions, reviewing defendants document production to gather potential exhibits	4.2	\$250.00	\$1,050.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/05/14	JB	Continue to prepare clients for depositions by reviewing and gathering relevant documents	2.6	\$250.00	\$650.00
12/08/14	JB	Travel to deposition of clients in Douglasville (0.7); prepare clients, attend and defend depositions of Fannie Cham and Jamie Stephenson (6); travel from deposition of clients in Douglasville (0.5)	7.2	\$250.00	\$1,800.00
12/09/14	JB	Travel to deposition of clients in Douglasville (0.6); prepare clients, attend and defend depositions of Bernard Artumus, Stephen Ventre, and Lamar Hayes (7.3); travel from deposition of clients in Douglasville (0.6)	8.5	\$250.00	\$2,125.00
12/11/14	JB	Continue drafting discovery deficiency letter including reviewing document production to assess what remained outstanding	1.0	\$250.00	\$250.00
12/16/14	JB	continue to work on damages calculations (0.3)	0.3	\$250.00	\$75.00
12/17/14	JB	Review damages calculations documents	0.3	\$250.00	\$75.00
01/04/15	JB	JB Review discovery requests served on multiple opt-ins	0.7	\$250.00	\$175.00
01/05/15	JB	Phone call with B. Graham regarding status of discovery and mediation; prepare litigation strategy for last month of discovery	0.7	\$250.00	\$175.00
01/06/15	JB	Prepare to schedule client meetings regarding discovery responses and confirm client availability for depositions	2.0	\$250.00	\$500.00
01/06/15	JB	prepare to schedule client meetings regarding discovery responses and confirm client availability for depositions (2.0)	2.0	\$250.00	\$500.00
01/07/15	JB	Phone call with B. Artumus regarding discovery responses meeting	0.2	\$250.00	\$50.00
01/07/15	JB	Legal research on standards for decertification post-discovery (1.5)	1.5	\$250.00	\$375.00
01/07/15	JB	begin to prepare to defend opt-in depositions	0.3	\$250.00	\$75.00
01/08/15	JB	Continue to prepare responses to individual discovery requests	1.6	\$250.00	\$400.00
01/09/15	JB	Continue to prepare responses to individual opt-in discovery requests	2.0	\$250.00	\$500.00
01/09/15	JB	prepare declaration in opposition to motion for decertification (1.3)	1.3	\$250.00	\$325.00
01/09/15	JB	begin to prepare to defend depositions of opt-ins, prepare declaration in opposition to motion for decertification (1.3)	1.3	\$250.00	\$325.00
01/11/15	JB	Review and analyze damages calculations sheets for each opt-in	4.0	\$250.00	\$1,000.00
01/12/15	JB	Travel to Douglasville for client meetings and depositions (0.8); prepare two clients for depositions, review client time and payroll records to prepare for multiple client discovery response meetings, meet with six clients to complete discovery responses (8);	8.8	\$250.00	\$2,200.00
01/12/15	JB	Travel to Douglasville for client meetings and depositions (0.8); prepare two clients for depositions, review client time and payroll records to prepare for multiple client discovery response meetings, meet with six clients to complete discovery responses (8);	8.8	\$250.00	\$2,200.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
01/13/15	JB	Client meeting with T. Floyd to prepare for deposition and confer with opposing counsel regarding deposition	1.0	\$250.00	\$250.00
01/13/15	JB	Client meeting with S. Liner regarding discovery responses and deposition preparation and defendant clients deposition	1.0	\$250.00	\$250.00
01/13/15	JB	Client meeting with B. Creekmore regarding discovery responses	1.0	\$250.00	\$250.00
01/13/15	JB	Prepare for and meeting with three clients regarding preparation of discovery responses	1.8	\$250.00	\$450.00
01/13/15	JB	Multiple client meetings with J. Lockette, T. Armstead, and L. Hayes regarding offer of judgment and discovery responses	3.5	\$250.00	\$875.00
01/20/15	JB	Continue to prepare responses to individual discovery requests served on the opt-in Plaintiffs	0.8	\$250.00	\$200.00
01/30/15	JB	Revise and edit responses to discovery requests (2.5); phone call with P. Manning regarding discovery response (.2); phone call with T. Sawadogo regarding discovery responses (.4); begin to prepare responses and objections to Defendants request for production of documents (2.5)	5.6	\$250.00	\$1,400.00
01/30/15	JB	begin to prepare responses and objections to Defendants request for production of documents (2.5)	2.5	\$250.00	\$625.00
01/31/15	JB	Continue to prepare responses and objections to Defendants requests for production of documents and interrogatories on the opt-in plaintiffs (8.0); phone call with A. Davis regarding discovery responses (.6); phone call with A. Chisholm regarding discovery responses (.7)	9.3	\$250.00	\$2,325.00
01/31/15	JB	Continue to prepare responses and objections to Defendants requests for production of documents and interrogatories on the opt-in plaintiffs	8.0	\$250.00	\$2,000.00
02/04/15	JB	Prepare and finalize supplemental responses to interrogatories and requests for admission and J. Stephensons responses to requests for production of documents and requests for production of documents and requests for admission and J. Stephensons responsive documents for services (1.8)	1.8	\$250.00	\$450.00
02/04/15	JB	Stephensons responses to requests for production of documents and prepare J. Stephensons responsive documents for services (1.8)	1.8	\$250.00	\$450.00
02/05/15	JB	prepare and finalize supplemental responses to interrogatories and requests for admission and J. Stephensons responses to requests for production of documents and prepare J. Stephensons responsive documents for services (1.8)	1.8	\$250.00	\$450.00
02/05/15	JB	Meeting with D. Hazelwood	0.5	\$250.00	\$125.00
02/05/15	JB	Review defendants discovery requests and certificates of service to assess whether Sherry Grant was served (0.4)	0.4	\$250.00	\$100.00
02/05/15	JB	Review Defendants citation to D. Thompson deposition testimony regarding decertification (0.2)	0.2	\$250.00	\$50.00
02/09/15	JB	Phone call with M. Thompson regarding damages report (0.3);	0.3	\$250.00	\$75.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
02/12/15	JB	Review and analyze Defendants motion for decertification and related exhibits (.6)	0.6	\$250.00	\$150.00
02/13/15	JB	Phone call with expert regarding report status (0.5)	0.5	\$250.00	\$125.00
02/13/15	JB	continue to prepare response to motion for decertification (2)	2.0	\$250.00	\$500.00
02/15/15	JB	legal research on research FWW settlement consent order	0.3	\$250.00	\$75.00
02/16/15	JB	Phone call with M. Thompson regarding expert report (0.3)	0.3	\$250.00	\$75.00
02/16/15	JB	Phone call with M. Thompson regarding expert report (0.3); review Plaintiffs and Defendants expert reports (2.5)	2.8	\$250.00	\$700.00
02/17/15	JB	Prepare multiple correspondence to opposing counsel regarding discovery; review M. Thompsons Exhibit B to assess individual damages claims; review and analyze Defendants settlement offers	2.0	\$250.00	\$500.00
02/20/15	JB	Legal research on the standard for decertification in order to prepare response brief	3.2	\$250.00	\$800.00
02/24/15	JB	Continue to prepare response to motion for decertification including reviewing deposition of L. Pendelton and incorporating the same into the statement of facts	1.4	\$250.00	\$350.00
02/25/15	JB	Continuing preparing response to motion for decertification including drafting, legal research on employers obligations related to automatically deducted breaks and reviewing multiple deposition	7.7	\$250.00	\$1,925.00
02/25/15	JB	transcripts (7)			
02/25/15	JB	continuing preparing response to motion for decertification including drafting, legal research on employers obligations related to automatically deducted breaks and reviewing multiple deposition transcripts	7.7	\$250.00	\$1,925.00
02/26/15	JB	Phone call with B. Graham regarding status of litigation (0.2)	0.2	\$250.00	\$50.00
03/03/15	JB	Begin to prepare motion for summary judgment by reviewing deposition testimony of D. Thompson for statement of undisputed facts (1.3)	1.3	\$250.00	\$325.00
03/04/15	JB	Continue to prepare motion for summary judgment by continuing to review deposition testimony of E. Dowdel for statement of undisputed facts (1)	1.0	\$250.00	\$250.00
03/05/15	JB	Continue to prepare motion for summary judgment by review deposition testimony of 30(b)(6) witness for statement of undisputed facts (1.9)	1.9	\$250.00	\$475.00
03/05/15	JB	Prepare declaration of M. Williams for response to decertification motion	0.3	\$250.00	\$75.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
03/05/15	JB	continue to prepare for Dickson deposition by preparing outline, reviewing pay and time records for exhibits, and phone call with M. Thompson (4.3)	4.3	\$250.00	\$1,075.00
03/09/15	JB	Revised and edit response to motion to decertify the class	3.3	\$250.00	\$825.00
03/10/15	JB	Continue to review deposition of B. Graham for statement of facts in summary judgment motion	1.5	\$250.00	\$375.00
03/12/15	JB	Begin to draft statement of material facts (1);	1.0	\$250.00	\$250.00
03/12/15	JB	Continue drafting motion for summary judgment (0.5)	0.5	\$250.00	\$125.00
03/12/15	JB	continue drafting motion for summary judgment (0.5)	0.5	\$250.00	\$125.00
03/13/15	JB	Legal research on requirement for hours to fluctuate (1.0); legal research on recent FWW opinions (.8)	1.8	\$250.00	\$450.00
03/13/15	JB	Continue drafting motion for summary judgment (2.5)	2.5	\$250.00	\$625.00
03/13/15	JB	Continue drafting motion for summary judgment (2.5)	2.5	\$250.00	\$625.00
03/16/15	JB	Continue to draft motion for summary judgment	8.2	\$250.00	\$2,050.00
03/16/15	JB	Continue to draft motion for summary judgment	8.2	\$250.00	\$2,050.00
03/21/15	JB	revise and edit motion for summary judgment (3.1)	3.1	\$250.00	\$775.00
03/21/15	JB	Review and analyze Defendants reply in support of motion for decertification (0.5)	0.5	\$250.00	\$125.00
03/23/15	JB	Revise and edit brief in support of motion for summary judgment and gather exhibits (1.0)	1.0	\$250.00	\$250.00
03/23/15	JB	Begin to prepare motion to strike Defendants reply in support of their motion for decertification, including legal research on appropriate standard	1.1	\$250.00	\$275.00
03/24/15	JB	Continue drafting motion to strike	1.3	\$250.00	\$325.00
03/25/15	JB	Prepare supplement to plaintiffs response to the motion to decertify	0.5	\$250.00	\$125.00
03/30/15	JB	Review and analyze Defendants motion for summary judgment, including analyze case law cited by Defendant	2.3	\$250.00	\$575.00
03/31/15	JB	Continue to read and analyze case law cited in Defendants Motion for Summary Judgment	1.7	\$250.00	\$425.00
04/06/15	JB	Continue to draft response to defendants Motion for Summary Judgment	1.3	\$250.00	\$325.00
04/08/15	JB	Continue drafting response brief to Defendants MSI (2.4); begin preparing Plaintiffs statement of additional facts (0.5).	2.9	\$250.00	\$725.00
04/10/15	JB	Separate phone calls from B. Bridges and J. Jordan regarding status of case	0.2	\$250.00	\$50.00
04/15/15	JB	Revise and edit response to Defendants motion for summary judgment	5.0	\$250.00	\$1,250.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
04/15/15	JB	Continue to revise and edit response to Defendants motion for summary judgment	2.1	\$250.00	\$525.00
04/16/15	JB	Continue to revise and edit response to Defendants motion for summary judgment and prepare for filing by assuring consistency of exhibit citations	3.2	\$250.00	\$800.00
04/22/15	JB	Continue to prepare reply brief in support of Plaintiffs motion for summary judgment	2.3	\$250.00	\$575.00
04/23/15	JB	Legal research on summary judgment burdens in general and summary judgment burdens in FLSA cases for the reply brief	3.2	\$250.00	\$800.00
04/27/15	JB	prepare correspondence to M. Thompson regarding the same (0.1).	0.1	\$250.00	\$25.00
04/27/15	JB	Legal research on admissibility of unsworn expert reports at summary judgment (0.9); prepare expert declaration to cure defect (0.2); prepare correspondence to M. Thompson regarding the same (0.1)	1.2	\$250.00	\$300.00
04/28/15	JB	Continue to draft reply brief in support of motion for summary judgment	6.5	\$250.00	\$1,625.00
04/28/15	JB	Continue to draft reply brief in support of motion for summary judgment	6.5	\$250.00	\$1,625.00
04/29/15	JB	Continue drafting reply brief	3.0	\$250.00	\$750.00
04/30/15	JB	Continue drafting reply brief	5.5	\$250.00	\$1,375.00
05/19/15	JB	Phone call with B. Harris regarding status of the case	0.1	\$250.00	\$25.00
05/29/15	JB	Review file material regarding status of T. Davis settlement check (.2)	0.2	\$250.00	\$50.00
05/29/15	JB	Phone call with S. Reid regarding status of litigation	0.1	\$250.00	\$25.00
06/02/15	JB	Follow-up on the status of part two of the litigation	0.3	\$250.00	\$75.00
06/09/15	JB	Phone calls with B. Artumus and B. Bridges regarding status of litigation	0.1	\$250.00	\$25.00
06/10/15	JB	Phone call with J. Stephenson regarding status of the case (.1)	0.1	\$250.00	\$25.00
06/17/15	JB	Prepare complaint for second lawsuit	3.5	\$250.00	\$875.00
06/17/15	JB	Review and analyze prior decertification briefing in order to prepare surreply	1.2	\$250.00	\$300.00
06/18/15	JB	Begin to prepare surreply in opposition to Defendants motion to decertify including preparation of M. Thompson declaration, analysis of exemption reports cited in Binson declaration, and review of new authority cited in Defendants reply	4.2	\$250.00	\$1,050.00
06/18/15	JB	Begin to prepare surreply in opposition to Defendants motion to decertify including preparation of M. Thompson declaration, analysis of exemption reports cited in Binson declaration, and review of new authority cited in Defendants reply	4.2	\$250.00	\$1,050.00
06/19/15	JB	Continue drafting surreply in opposition to Defendants motion to decertify (4.1)	4.1	\$250.00	\$1,025.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
06/19/15	JB	Continue drafting surreply in opposition to Defendants motion to decertify (4.1)	4.1	\$250.00	\$1,025.00
06/19/15	JB	phone call with M. Thompson regarding deduction cancelations and declaration (0.4)	0.4	\$250.00	\$100.00
06/22/15	JB	Finalize revisions and edits to surreply in opposition to motion for decertification	1.7	\$250.00	\$425.00
06/23/15	JB	Revise and edit complaint	0.5	\$250.00	\$125.00
06/23/15	JB	Phone call with T. Armstead regarding status of the litigation	0.1	\$250.00	\$25.00
06/24/15	JB	Continue to revise and edit complaint (0.7)	0.7	\$250.00	\$175.00
06/26/15	JB	Review and analyze Order granting motion to decertify (0.5); legal research on appeal of decertification orders (0.9)	1.4	\$250.00	\$350.00
06/26/15	JB	Review and analyze Order granting motion to decertify (0.5)	0.5	\$250.00	\$125.00
07/08/15	JB	Continue legal research on interlocutory appeal	0.3	\$250.00	\$75.00
07/09/15	JB	prepare update correspondence to opt-in plaintiffs regarding decertification (0.1)	0.1	\$250.00	\$25.00
07/09/15	JB	Prepare lawsuit on behalf of individual Plaintiffs (2.2);	2.2	\$250.00	\$550.00
07/10/15	JB	Revise correspondence to clients regarding update on decertification order and coordinate sending of the forty letters (0.3);	0.3	\$250.00	\$75.00
07/22/15	JB	Review recent decision by Judge Batten regarding FWW application for potential upcoming summary judgment refiling	0.4	\$250.00	\$100.00
07/22/15	JB	begin legal research on Rule 20 joinder versus collective action (1.5)	1.5	\$250.00	\$375.00
07/23/15	JB	Office meeting with TC regarding response to motion to dismiss	0.3	\$250.00	\$75.00
07/23/15	JB	continue research for cases permitting rule 20 joinder post-decertification (3.6)	3.6	\$250.00	\$900.00
07/24/15	JB	Continue legal research for cases allowing Rule 20 joinder after decertification	4.2	\$250.00	\$1,050.00
07/28/15	JB	Begin to draft response to motion to dismiss for lack of joinder	2.3	\$250.00	\$575.00
07/28/15	JB	Phone call with P. Davis regarding status of litigation	0.1	\$250.00	\$25.00
07/28/15	JB	Begin to draft response to motion to dismiss for lack of joinder	2.3	\$250.00	\$575.00
07/29/15	JB	Continue to prepare response to motion to dismiss on joinder grounds	2.4	\$250.00	\$600.00
07/30/15	JB	Continue to prepare response to motion to dismiss on joinder grounds and revise motion regarding lqbal challenges	3.2	\$250.00	\$800.00
07/31/15	JB	Continue to draft joinder portion of the response to motion to dismiss	3.2	\$250.00	\$800.00
07/31/15	JB	Continue to draft joinder portion of the response to motion to dismiss	3.2	\$250.00	\$800.00
08/09/15	JB	Review and respond to correspondence from M. Bice regarding status of the litigation	0.1	\$250.00	\$25.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
08/17/15	JB	Review and analyze SDNY decision on assertion of good faith defense waiving attorney-client privilege to prepare discovery requests (0.3)	0.3	\$250.00	\$75.00
08/24/15	JB	Review and respond to correspondence from B. Graham regarding the status of the litigation	0.1	\$250.00	\$25.00
08/25/15	JB	Phone call with J. Stephenson regarding status of the litigation	0.1	\$250.00	\$25.00
08/31/15	JB	Phone call w B. Creekmore regarding status of the case	0.1	\$250.00	\$25.00
09/02/15	JB	Confer with TC regarding MSJ response responsibilities (0.1); review and analyze Defendants renewed motion for summary judgment attached exhibits (1.4)	1.5	\$250.00	\$375.00
09/03/15	JB	Continue to prepare response to motion for summary judgment	0.7	\$250.00	\$175.00
09/04/15	JB	call from J. Stephenson re status, future actions (.8)	0.8	\$250.00	\$200.00
09/14/15	JB	Phone call with B. Artmus regarding status of litigation (0.1); phone call with B. Bridges regarding status of litigation (0.1).	0.2	\$250.00	\$50.00
09/15/15	JB	Phone call with P. Dean regarding status of case and continued missed breaks	0.1	\$250.00	\$25.00
09/16/15	JB	Phone call with S. Reid regarding status of the case	0.1	\$250.00	\$25.00
09/16/15	JB	Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion	4.8	\$250.00	\$1,200.00
09/17/15	JB	Phone call with B. Graham regarding status of the case, recent short staffing and missed breaks, and new supervisors failure to pay overtime	0.2	\$250.00	\$50.00
09/17/15	JB	Phone call with B. Graham regarding status of the case, recent short staffing and missed breaks, and new supervisors failure to pay overtime	0.2	\$250.00	\$50.00
09/17/15	JB	Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion and response to defendants statement of facts along with revisions to memorandum of law in response to renewed Motion for Summary Judgment	9.2	\$250.00	\$2,300.00
09/18/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	1.4	\$150.00	\$210.00
09/19/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	2.3	\$250.00	\$575.00
09/20/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	1.1	\$250.00	\$275.00
09/21/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment, response to defendants statement of facts, and plaintiffs statement of additional facts (5.5)	5.5	\$250.00	\$1,375.00
10/06/15	JB	Review and analyze reply in support of motion for summary judgment including new exhibits and response to Plaintiffs statement of facts	1.1	\$250.00	\$275.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
10/09/15	JB	Continue to prepare response to motion to clarify	0.7	\$250.00	\$175.00
10/12/15	JB	Revise response to motion to clarify	0.8	\$250.00	\$200.00
10/21/15	JB	Continue drafting form complaint to use for individual complaints per Court order	1.1	\$250.00	\$275.00
10/31/15	JB	Continue to draft individual complaints	1.6	\$250.00	\$400.00
11/03/15	JB	Prepare a reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	1.0	\$250.00	\$250.00
11/03/15	JB	Revise and edit reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	0.3	\$250.00	\$75.00
11/12/15	JB	Analyze defendants prior document production and prepare an index of the same	1.5	\$250.00	\$375.00
11/13/15	JB	Analyze defendants prior document production and prepare an index of the same	1.3	\$250.00	\$325.00
03/02/16	JB	Meeting with B. Artumus regarding settlement documents and amount	0.1	\$295.00	\$29.50
03/21/16	JB	Confer with SC regarding status of settlement agreement signatures (0.2)	0.2	\$250.00	\$50.00
03/21/16	JB	multiple phone calls with Mr. Booze regarding status of settlement payment (0.1)	0.1	\$250.00	\$25.00
09/30/16	JB	Review file material for evidence that four plaintiffs did not elect not to join following the decertification order (0.2);	0.2	\$250.00	\$50.00
9/18/2013 JB	JB	Continue drafting complaint (.3); confer with DRK regarding strategy for drafting complaint (.3); draft additional questions to clients to use in drafting the complaint (.4)	1.0	\$250.00	\$250.00
TOTAL HOURS/AMOUNT			486.9		\$121,589.50
06/28/15	JC	Research case law re appealing decertification of FLSA collective 0.90 225.00 action.	0.9	\$250.00	\$225.00
06/29/15	JC	Review order of decertification (.5); research and analyze case law re appealing decertification orders (1.6)	2.1	\$250.00	\$525.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
07/01/15	JC	Correspondence with DRK re motion for certification for interlocutory appeal	0.1	\$250.00	\$25.00
TOTAL HOURS/AMOUNT			3.1		\$775.00
04/11/14	SC	Per JB's request I saved documents from a CD, printed the documents and created a folder for the file	0.6	\$85.00	\$51.00
12/01/14	SC	Per JB's request I called Fannie Cham, Bernard Artumus, Jamie Stephenson, Lamar Hayes, Benjamin Creekmore, and Steven Ventre to inform them that they are being deposed and to set up the date and time of their depositions. I also sent each one of them an email confirming their deposition times and the notice of deposition.	0.4	\$85.00	\$34.00
01/06/15	SC	I called all deponents; Starsheema Drake, Portia Manning, Rebecca Schwam, Lavon Flood, Steven Reid, Travis Floyd, Angela Cooper and Steven Liner to inform them of their upcoming depositions and to let them know that the mediation had been cancelled. I also called all opt in clients (47 total) that had been served with discovery to inform them the mediation had been cancelled and to set up times for them to meet with JB and Douglas R. Kertscher. I created a detailed index which included scheduled time, date for depositions and meetings.	2.5	\$85.00	\$212.50
01/08/15	SC	Per JB's request I called Sherri Grant, Matthew Haecker, Frederick Hoxie, Steven Liner and Nicole Stevens to schedule depositions for 3 open slots that needed to be filled	0.2	\$85.00	\$17.00
03/05/15	SC	I drafted and sent letters to all clients (47) in regards to each individuals settlement offer given by youth villages	0.7	\$85.00	\$59.50
03/31/15	SC	I drafted and mailed letters re settlement agreements to Flood, Gaddy, Cooper, Jackson, and Sykes	0.3	\$85.00	\$25.50
04/15/15	SC	I created an index of those who filed their consents late	0.2	\$85.00	\$17.00
02/25/16	SC	called all plaintiffs re settlement documents and status update	4.0	\$85.00	\$340.00
03/10/16	SC	emailed Hazelwood re settlement and status update	0.1	\$85.00	\$8.50
03/18/16	SC	emailed Amber Davis re status update	0.1	\$85.00	\$8.50
TOTAL HOURS/AMOUNT			9.1		\$773.50
07/22/15	TC	Review of file material in order to draft response to MTD	2.7	\$200.00	\$540.00
07/27/15	TC	research 11th circuit case law re: Rule 20 joinder permitted after denial of conditional certification or decertification of a collective action (.5)	0.5	\$200.00	\$100.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
07/27/15	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (.5);	0.5	\$200.00	\$100.00
07/28/15	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (2.0);	2.0	\$200.00	\$400.00
07/29/15	TC	Draft rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (4.7)	4.7	\$200.00	\$940.00
07/30/15	TC	Continue to draft Rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss	5.0	\$200.00	\$1,000.00
07/31/15	TC	draft rule 11 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (2.7)	2.7	\$200.00	\$540.00
07/31/15	TC	Research 11th Circuit cases to support argument that group allegations were properly plead when facts are common to all plaintiffs (2.6); editing of brief in order to reflect case law in support of sufficiency of pleading of group allegations (2.2)	4.8	\$200.00	\$960.00
07/31/15	TC	editing of brief in order to reflect case law in support of sufficiency of pleading of group allegations (2.2)	2.2	\$200.00	\$440.00
08/03/15	TC	Research 11th Circuit and general federal circuit authority for sufficiency of group allegations under Rule 8 in FLSA claims and proper for all Plaintiffs to rely on such group allegations	6.0	\$200.00	\$1,200.00
08/31/15	TC	Receipt/analyze Defendants renewed motion for summary judgment statement of undisputed facts and affidavits in order to prepare response	1.7	\$200.00	\$340.00
09/10/15	TC	Draft legal arguments for response to Defendants renewed motion for summary judgment (8.0)	8.0	\$200.00	\$1,600.00
09/10/15	TC	Receipt/analyze Defendants renewed motion for summary judgment (.5); Draft legal arguments for response to Defendants renewed motion for summary judgment (8.0)	8.5	\$200.00	\$1,700.00
09/11/15	TC	Continue to draft legal arguments for response to Defendants renewed motion for summary judgment	3.0	\$200.00	\$600.00
09/11/15	TC	Continue to draft legal arguments for response to Defendants renewed motion for summary judgment	3.0	\$200.00	\$600.00
11/25/15	TC	Draft/create spreadsheet of applicable arguments in each MTD	1.5	\$200.00	\$300.00
11/29/15	TC	research national case law re: statute of limitations after collective action decertification (2.4)	2.4	\$200.00	\$480.00
12/03/15	TC	Meeting with DRK re response to MTD and filing of Rule 56(d) motion	0.5	\$200.00	\$100.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/04/15	TC	Continue to research applicability of a Rule 56(d) motion in response to defendants motion to dismiss with attached exhibits submitted to the Court (3.0); drafting of Plaintiffs response (4.4)	4.4	\$200.00	\$880.00
12/05/15	TC	Continue to draft Plaintiff (Artumus) Response to Defendants Motion to Dismiss and Motion for Summary Judgment	6.5	\$200.00	\$1,300.00
12/05/15	TC	Continue to draft Plaintiff (Artumus) Response to Defendants Motion to Dismiss and Motion for Summary Judgment (6.5)	6.5	\$250.00	\$1,625.00
12/06/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Motion for Summary Judgment (10.2)	10.2	\$200.00	\$2,040.00
12/06/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Motion for Summary Judgment (10.2)	10.2	\$200.00	\$2,040.00
12/07/15	TC	(Artumus) Receipt/review of correspondence from OC re: extension of time for Plaintiffs to file response to defendants motions (.1); draft/file Consent Motion to extend time (.8)	0.8	\$200.00	\$160.00
12/07/15	TC	(Bice) Draft Plaintiffs response to Defendants Motion to Dismiss FLSA claims and breach of contract claim; research GA and 11th Circuit case law re: statute of limitations for state law breach of contract and preemption of FLSA on contract claim (2.9)	2.9	\$200.00	\$580.00
12/07/15	TC	(Caudle) Draft/file Consent Motion to extend Response to Def. Mot. For Summary Judgment (.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Creekmore) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Drake) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Haecker) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Harris) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Reid) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Sawadago) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Sims) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Starr) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/07/15	TC	(Bice) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
12/07/15	TC	(Caudle) Draft/file Consent Motion to extend Response to Def. Mot. for Summary Judgment	0.2	\$200.00	\$40.00
12/08/15	TC	(Artumus) Receipt of DRK edits to Plaintiffs Response to Defendants Motion to Dismiss; continue to draft/edit same (3.4)	3.4	\$200.00	\$680.00
12/08/15	TC	Draft/file proposed Order for Extension of Time to Respond to Defendants Motion to Dismiss and Motion for Summary Judgment (.7)	0.7	\$200.00	\$140.00
12/08/15	TC	Draft/file proposed Order for Extension of Time to Respond to Defendants Motion to Dismiss and Motion for Summary Judgment (.7)	0.7	\$200.00	\$140.00
12/08/15	TC	Research summary judgment standard for breach of contract claim in FLSA context in order to draft motion in response to summary judgment (2.3)	2.3	\$200.00	\$460.00
12/09/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Declaration of DRK in support of Rule 56(d) (6.2)	6.2	\$200.00	\$1,240.00
12/10/15	TC	(Artumus) Draft affidavit of DRK for Rule 56(d) (1.2); add citation to affidavit in motion and continue to edit motion. (1.0)	1.2	\$200.00	\$240.00
12/10/15	TC	(Bice) draft Plaintiffs Response in Opposition to Defendants MTD (5.1)	5.1	\$200.00	\$1,020.00
12/11/15	TC	(Caudle) Draft response to motion for partial summary judgment (1.2)	1.2	\$200.00	\$240.00
12/11/15	TC	(Bice) Continue to draft Plaintiffs 200.00/hr Response in Opposition to Defendants MTD (1.2)	1.2	\$200.00	\$240.00
12/11/15	TC	(Caudle) Research summary judgment issues of preemption and 3 year statute of limitations for willfulness under the FLSA, burden of proof on movant (.6); draft response to motion for partial summary judgment (1.2)	1.8	\$200.00	\$360.00
12/12/15	TC	(Caudle) Research job offer acknowledgement as valid contract and burden of proof of contract at dismissal stage, continue to draft response to motion for partial summary judgment (9.0); draft DRK declaration for rule 56(d) (1.1)	10.1	\$200.00	\$2,020.00
12/12/15	TC	(Caudle) Research job offer acknowledgement as valid contract and burden of proof of contract at dismissal stage; continue to draft response to motion for partial summary judgment (9.0)	9.0	\$200.00	\$1,800.00
12/14/15	TC	(Creekmore) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Drake) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Haecker) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/14/15	TC	(Harris) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Reid) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Sawadogo) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Sims) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Starr) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
12/14/15	TC	(Caudle) Receipt/review of DRK edits to Plaintiffs Opposition to Defendants Motion for Partial Summary Judgment; continue to edit; add citations to DRK declaration (2.5)	2.5	\$200.00	\$500.00
07/28/16	TC	research 11th circuit case law re: Rule 20 Joinder permitted after denial of conditional certification or decertification of a collective action (4.5)	4.5	\$200.00	\$900.00
TOTAL HOURS/AMOUNT			158.1		\$31,945.00
01/22/14	TO	Prepared Armstead overtime calculations	0.6	\$115.00	\$69.00
12/16/14	TO	Worked on overtime calculations for Artumus	2.7	\$115.00	\$310.50
12/17/14	TO	Worked on overtime calculations for Artumus, Cham	1.2	\$115.00	\$138.00
12/17/14	TO	Prepared overtime calculations for Cham	1.6	\$115.00	\$184.00
12/17/14	TO	Prepared overtime calculations for Ventre	1.6	\$115.00	\$184.00
12/17/14	TO	Prepared overtime calculations for Booze	1.9	\$115.00	\$218.50
12/18/14	TO	Prepared overtime calculations for Graham	2.1	\$115.00	\$241.50
12/18/14	TO	Prepared overtime calculations for Graham	0.5	\$115.00	\$57.50
12/18/14	TO	Prepared overtime calculations for Holmes	0.9	\$115.00	\$103.50
12/18/14	TO	Prepared overtime calculations for Stevenson, Davis (began)	2.7	\$115.00	\$310.50
12/19/14	TO	Worked on overtime calculations for Davis	0.4	\$115.00	\$46.00
12/22/14	TO	Prepared Creekmore overtime calculations	0.5	\$115.00	\$57.50
12/22/14	TO	Prepared Burgess overtime calculations	0.5	\$115.00	\$57.50
12/22/14	TO	Prepared Bolton overtime calculations	0.3	\$115.00	\$34.50
12/22/14	TO	Prepared Brinkley overtime calculations	0.2	\$115.00	\$23.00
12/22/14	TO	Prepared Caudle overtime calculations	0.4	\$115.00	\$46.00
12/22/14	TO	Prepared Chisholm overtime calculations	0.2	\$115.00	\$23.00
12/22/14	TO	Prepared Craft overtime calculations	1.4	\$115.00	\$161.00
12/23/14	TO	Prepared Davis, Willoughby calculations	4.1	\$115.00	\$471.50

DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
12/29/14	TO	Prepared Floyd overtime calculations	0.8	\$115.00	\$92.00
12/29/14	TO	Prepared Dean overtime calculations	1.5	\$115.00	\$172.50
01/05/15	TO	A. Davis calculations	1.5	\$115.00	\$172.50
01/05/15	TO	T. Davis, B Harris, M. Haynes, D. Hazelwood, F. Hoxie, B. Jackson calculations	4.7	\$115.00	\$540.50
01/06/15	TO	J. Jordan, S. Liner, J. Lockett, M. McKelvey, R. McNair, T. Sawadogo, C. Simmons, G. Smith calculations	7.7	\$115.00	\$885.50
01/07/15	TO	Demand calculations for Sykes, Williams, Bridgers, Cooper, Drake, Flood, Gaddy, Gilstrap, Manning, Reid, Schwam, Starr, Stevens, Waugh, complied information	9.3	\$115.00	\$1,069.50
01/08/15	TO	Reviewed discovery requests for uniformity, noted discrepancies	1.7	\$115.00	\$195.50
01/14/15	TO	Draft first ROGS RPD to claimant	0.8	\$115.00	\$92.00
01/16/15	TO	Overtime calculations	3.1	\$115.00	\$356.50
TOTAL HOURS/AMOUNT			54.9		\$6,313.50